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9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA
11

12 UNITED STATES OF AMERICA,)
13 Plaintiff,) CASE NO. 2:19-CR-000222-KJD-BNW
14 vs.)
15 LANCE K. BRADFORD,)
16 Defendant,)
17

18 **STIPULATION AND ORDER TO MODIFY**
CONDITION OF PRETRIAL RELEASE

19 IT IS HEREBY STIPULATED and AGREED by and between the United States of America,
20 by and through CHRISTOPHER CHIOU, Acting United States Attorney, and STEVEN W.
21 MYHRE, Assistant United States Attorney, and Defendant LANCE K. BRADFORD, by and through
22 his counsel, RICHARD A. WRIGHT, ESQUIRE, and RUSSELL E. MARSH, ESQUIRE, that the
23 conditions of Mr. Bradford's Pretrial Release be modified to (1) eliminate the requirement of
24 supervision by the U.S. Pretrial Services Office; and (2) allow for the return of his passport, so that
25 he can travel internationally upon notification of attorneys for the government. The parties agree to
26 eliminate or modify certain conditions of release so that these changes can take effect.

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1 1. On September 3, 2019, Mr. Bradford appeared pursuant to a Summons, and was
2 released on a PR Bond. (ECF No.7). Mr. Bradford was placed on pretrial supervision, he was
3 ordered to surrender his passport, and his travel was restricted to the continental United States unless
4 approved by Pretrial Services. (*Id.* at 3).

5 2. Mr. Bradford appeared for arraignment on a Superseding Indictment on September
6 9, 2020, and he was continued on the same terms of release. (ECF No. 38). Mr. Bradford's trial in
7 this matter is currently set for November 15, 2021. (ECF No. 44).

8 3. The parties agree that the requirement that Mr. Bradford report to Pretrial Services
9 (ECF No. 7, Condition No. 7) should be eliminated in its entirety.

10 4. The parties also agree that the conditions of Mr. Bradford's pretrial release be
11 modified to allow him to obtain his passport and to travel internationally. Conditions Nos. 17 and
12 19 of Mr. Bradford's PR Bond (ECF No. 7) will be stricken. Condition No. 20 of his PR Bond (ECF
13 No. 7) will be modified to provide that Mr. Bradford will notify the attorneys for the government
14 prior to any international travel and when he returns to the United States.

15 5. Pretrial Services agrees with these changes in Mr. Bradford's conditions of release.
16 Mr. Bradford's Pretrial Services Officer Jessie Moorehead has reviewed and does not oppose this
17 Stipulation and Order.

18 6. The parties agree that all other conditions of Mr. Bradford's release will remain in
19 full force and effect.

20 Dated this 17th day of May, 2021.

21
22 WRIGHT MARSH & LEVY

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24 BY /s/ Russell E. Marsh
25 RICHARD A. WRIGHT, ESQUIRE
26 RUSSELL E. MARSH, ESQUIRE
27 Attorneys for Defendant Bradford

Respectfully submitted,

CHRISTOPHER CHIOU
ACTING UNITED STATES ATTORNEY

28
BY /s/ Steven W. Myhre
STEVEN W. MYHRE
Assistant U.S. Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,)
4 Plaintiff,)
5 vs.)
6 LANCE K. BRADFORD,)
7 Defendant,)
8

CASE NO. 2:19-CR-000222-KJD-BNW

9 **ORDER**

10 Based on the Stipulation between the Defendant, Lance K. Bradford, and the Government,
11 through counsel, and good cause appearing,

12 **IT IS HEREBY ORDERED** that the conditions of Defendant Bradford's pretrial release
13 be modified as follows:

- 14 1. The requirement that Mr. Bradford report to U.S. Pretrial Services (PR Bond,
15 Condition No. 7) is eliminated.
- 16 2. Mr. Bradford will be allowed to travel internationally without prior the approval of
17 U.S. Pretrial Services or the Court. Conditions Nos. 17 and 19 will be stricken from
18 the PR Bond (ECF No. 7). U.S. Pretrial Services will return Mr. Bradford's passport
19 to him forthwith.
- 20 3. Condition No. 20 of the PR Bond (ECF No. 7) is modified to provide that Mr.
21 Bradford will provide notice of any international travel to the attorneys for the
22 government prior to any international travel and will notify them of his return to the
23 United States.
- 24 4. All other conditions Mr. Bradford's of pretrial release remain in effect.

25 IT IS SO ORDERED.

26 Dated: May 18, 2021

27 
28 ELAYNA J. YOUCHAK
UNITED STATES MAGISTRATE JUDGE